

1 THE HONORABLE JOHN COUGHENOUR  
2 Trial Date: June 23, 2025  
3 Moving Party: Joint  
4 Note for Hearing: January 2, 2025  
5 Without Oral Argument

6  
7 UNITED STATES DISTRICT COURT  
8  
9 WESTERN DISTRICT OF WASHINGTON

10 TRACEY SHANFELD, an Individual,

11 Case No. 2:24-cv-00516-JCC

12 Plaintiff,

13 v.  
14  
15 **SECOND STIPULATED MOTION TO  
16 CONTINUE TRIAL DATE AND  
17 AMEND CASE SCHEDULE**

18 EVERGREEN TREATMENT SERVICES, a  
19 Non-Profit Organization,

20 Defendant.  
21  
22

**I. JOINT REQUEST FOR RELIEF**

23 Plaintiff Tracey Shanfeld and Defendant Evergreen Treatment Services (collectively, the  
24 “Parties”) by and through their respective counsel, stipulate and jointly move the Court for an  
25 Order continuing the trial date in this matter until at least November 10, 2025, or as soon as  
26 possible thereafter, and continuing the court deadlines, the discovery cutoff deadline, and pre-trial  
deadlines in accordance and in due course to accommodate the new trial date.

27 **II. FACTS IN SUPPORT OF STIPULATED MOTION**

28 1. Plaintiff Tracey Shanfeld filed this employment discrimination lawsuit on April  
29 16th, 2024.

30 **SECOND STIPULATED MOTION TO CONTINUE TRIAL DATE  
31 AND AMEND CASE SCHEDULE - 1**

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1       2. The parties have been working in good faith to complete discovery and to this date  
2 have conducted four depositions and exchanged written discovery.

3       3. The deposition of witness, Migdalia Verdejo, former ETS employee and coworker  
4 of Ms. Shanfeld was scheduled for April 18, 2025.

5       4. Ms. Verdejo refused to appear virtually for her deposition and informed Plaintiff's  
6 counsel that she would not attend despite repeated requests for compliance.

7       5. The parties agreed on the record that Ms. Verdejo's deposition would be subject to  
8 a motion to compel which will be forthcoming.

9       6. Plaintiff's counsel attempted to serve Ms. Ann Curiel, former ETS employee and  
10 coworker of Ms. Shanfeld, with a deposition notice for April 17, 2025 after receiving information  
11 from Defendant regarding her contact information in late March 2025.

12       7. The contact information initially provided by Defendant for Ms. Curiel was no  
13 longer accurate and Plaintiff's attempt at service were unsuccessful.

14       8. On or about April 15, 2025, Defendant provided updated contact information for  
15 Ms. Curiel.

16       9. Plaintiff was in the process of serving a deposition notice to Ms. Curiel for May 5,  
17 2025 but the parties have since agreed to postpone Ms. Curiel's deposition to make good faith  
18 efforts to mediate the matter on May 5, 2025, pursuant to the Court's order and case schedule and  
19 avoid potential costs to depose Curiel and Verdejo.

20       10. The parties have agreed to reschedule the trial date to November 2, 2025, or later  
21 due to a conflict with another federal jury trial, 2:21-cv-01410-LK *Stepien v. Raimondo* which was  
22 recently continued to a date, August 25, 2025 (Stepien will at minimum be a 10 day trial) that  
23 overlap or closely coincide with the current trial setting in this matter of September 2, 2025.

24       11. Accordingly, the Parties respectfully request that the Court continue the trial date

25       SECOND STIPULATED MOTION TO CONTINUE TRIAL DATE  
26 AND AMEND CASE SCHEDULE - 2

Nolan Lim Law Firm, PS  
1111 Third Ave, Suite 1850  
Seattle, WA 98101  
Tel: 206-774-8874  
Fax: 206-430-622

1 and case schedule as described below, for good cause:

2 a. Continue the trial date until at least November 10, 2025, or as soon as  
 3 possible thereafter.

4 b. Direct the Clerk of Court to enter an Amended Case Schedule with new  
 5 scheduling dates reflecting the new trial date and new litigation deadlines, including the  
 6 pre-trial deadlines, in accordance and in due course to accommodate the new trial date and  
 7 allow the parties to file a stipulated motion to compel Verdejo's testimony and give  
 8 reasonable time to conduct the deposition of Anna Curiel should the parties be unable to  
 9 resolve this matter at mediation.

10 12. This stipulation and request to extend the case schedule is made in good faith and  
 11 is not for the purposes of undue delay.

12  
 13 For the reasons listed above, the Parties respectfully request that the Court grant their Joint  
 14 Motion to Continue Trial Date and Amend Case Schedule.

15  
 16 IT IS SO STIPULATED this April 30, 2025.

17  
 18 DATED: April 30, 2025

*s/Nolan Lim*  
 19 NOLAN LIM, WSBA # 36830  
 Nolan Lim Law Firm  
 20 1111 Third Avenue, Suite 1850  
 Seattle, Washington 98101  
 Phone: (206) 774-8874  
 21 Email: nolan@nolanlimlaw.com

22 *Counsel for Plaintiff*

23 DATED: April 30, 2025

NORTHCRAFT BIGBY, PC

24  
 25 SECOND STIPULATED MOTION TO CONTINUE TRIAL DATE  
 AND AMEND CASE SCHEDULE - 3

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2 Aaron Bigby, WSBA #29271  
3 819 Virginia St., Suite C-2  
4 Seattle, WA 98101

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*Counsel for Defendant*

SECOND STIPULATED MOTION TO CONTINUE TRIAL DATE  
AND AMEND CASE SCHEDULE - 4

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## ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED

The parties request for a New trial date and Amended Case Schedule with new associated pretrial deadlines is GRANTED.

DATED: May 2, 2025

John C. Conneran

John C. Coughenour  
United States District Court Judge

**SECOND STIPULATED MOTION TO CONTINUE TRIAL DATE  
AND AMEND CASE SCHEDULE - 5**

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